

From: [Tzhone, Stephen](#)
To: [Sanchez, Carlos](#); [Moran, Gloria](#); [Andrews, Lawrence](#)
Subject: FW: Arkwood - Pentachlorophenol | Pesticides | US EPA
Date: Wednesday, February 11, 2015 5:23:26 PM
Attachments: [pentachlorophenol_red.pdf](#)
[ATT00001.htm](#)
[980130ArjmandiLetterARstandardH2O.pdf](#)
[ATT00002.htm](#)

From: curt@grish.org [mailto:curt@grish.org]

Sent: Wednesday, February 11, 2015 5:20 PM

To: keogh@adeq.state.ar.us

Cc: Charles Curtis Grisham Jr.; Nelson, Russell; katie.beck@governor.arkansas.gov; Tzhone, Stephen; Meyer, John; Murray, Suzanne; spencer@adeq.state.ar.us; Carpenter, Ellen

Subject: Fwd: Arkwood - Pentachlorophenol | Pesticides | US EPA

Dear Director Keogh:

I forward the below message for your information, as I feel it contains the most salient and compelling set of data I have ever found regarding the issue of ADEQ water quality standards concerning Pentachlorophenol in New Cricket Spring near the Arkwood Superfund site in Omaha, Boone County.

I ask that ADEQ consider this information carefully and review the water quality standard that has been set by ADEQ for the cleanup goal at Arkwood Superfund site.

I ask that the water cleanup goal for Arkwood be adjusted to account for the fact that the ADEQ standard for New Cricket Spring — which has never been a source of drinking water — is thousands of times more stringent than the EPA's own "Drinking Water Levels of Concern" (DWLOCs) for Pentachlorophenol for acute and chronic dietary risk from drinking water, either for adults or for children ages 1-6.

Thank you for your attention and patience.

Sincerely,

Charles Grisham, Junior

Begin forwarded message:

From: "grish.org" <curt@grish.org>

Subject: Arkwood - Pentachlorophenol | Pesticides | US EPA

Date: March 24, 2011 at 11:19:26 PM PDT

Cc: "grish.org" <curt@grish.org>, "Hynum, Tammie" <HYNUM@adeq.state.ar.us>, Sanchez.Carlos@epamail.epa.gov

To: Donald Williams <Williams.Donald@epamail.epa.gov>

Don,

Please see the attached EPA document, found at the following link:

<http://www.epa.gov/oppsrrd1/reregistration/pentachlorophenol/>

This is the most compelling evidence I have found that the water issue at Arkwood is in fact a red-herring non-issue, and an exceedingly expensive one at that.

1) Pentachlorophenol for use as a pesticide was re-registered by the EPA in 2008.

Here is an excerpt from the attached EPA "Reregistration Eligibility Decision for Pentachlorophenol (List B Case 2505)" approved by Frank T. Sanders, Director, Antimicrobials Division, on September 28, 2008:

"Surface water runoff from pentachlorophenol treated utility poles may be a possible source for pentachlorophenol or its transformation products in drinking water or in foods. Estimated Environmental Concentrations (EECs) for surface water have been calculated by the Agency. Drinking water levels of concern (DWLOCs) for acute and chronic dietary risk from drinking



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*water were calculated. DWLOCs calculated for surface water for pentachlorophenol were **10,465 ppb for adult males and females and 2,990 ppb for children ages 1-6.***" (emphasis added)

2) The Arkansas standard as derived via unknown methodology in 1998 by Masoud Arjmandi, staff engineer at Arkansas Department of Environmental Quality (then called the Arkansas Department of Pollution Control and Ecology), requires concentrations of pentachlorophenol in New Cricket Spring to be less than **9.3 ppb** (see attached letter which was included in Mr. Ghose's draft 3rd Five-Year Review).

3) The yearly averages of pentachlorophenol concentrations in New Cricket Spring (according to data presented by Mr. Ghose in his draft 3rd Five-Year Review) range between a **high of 670 ppb** (1996, the first year of sampling, based upon two samples for the whole year) and a **low of 13 ppb** (2009).

The highest concentration of pentachlorophenol in New Cricket Spring ever recorded for any single sample was the extremely anomalous reading of **1190 ppb** from October 22, 2007.

This reading was 548% higher than the next-highest reading for all of 2007 (217 ppb, also anomalous within the dataset) and therefore of dubious reliability.

Even so, this highest-ever recorded concentration of pentachlorophenol in New Cricket Spring is **less than one-eighth** of the EPA drinking water level of concern for adults and **less than one-half** the drinking water level of concern for children ages 1-6 for acute and chronic dietary risk from drinking water as expressed in the 2008 EPA reregistration document cited above.

4) New Cricket Spring has never been a source of drinking water. Pentachlorophenol from the Arkwood site has never impacted **any** source of drinking water.

Thank you,

Curt Grisham

TARGET SHEET

SITE NAME: ARKWOOD INCORPORATED

CERCLIS I.D.: ARD084930148

TITLE OF DOC.: ATT00001.HTM

DATE OF DOC.: 02/11/2015

NO. OF PGS. THIS TARGET SHEET REPLACES: UNKNOWN

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CASE #: _____ **SDG #:** _____

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TARGET SHEET

SITE NAME: ARKWOOD INCORPORATED

CERCLIS I.D.: ARD084930148

TITLE OF DOC.: ATT00002.HTM

DATE OF DOC.: 02/11/2015

NO. OF PGS. THIS TARGET SHEET REPLACES: UNKNOWN

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